

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LEO RATTÉ, a minor by his Next Friend,
CLAIRE ZIMMERMAN; CLAIRE
ZIMMERMAN; and CHRISTOPHER
RATTÉ,

Plaintiffs,

Case No: 11-11190

vs.

HON. AVERN COHN

MAURA CORRIGAN; CITY OF DETROIT;
CELESTE REED; SCOTT HALL; RICHARD
KNOX; SUALYN HOLBROOK; CHERITA
TURNER-ROYSTER; and JUDY A.
HARTSFIELD,

Defendants.

ERRATA

On November 26, 2013, the Court issued a Memorandum And Order Severing Count I Against Defendant Corrigan And Denying Defendant Hartsfield's Motion To Dismiss (Doc. 63) And Granting Defendant's Holbrook's And Turner's Motion For Summary Judgment (Doc. 64). See (Doc. 86). The Memorandum and Order on page 14 states:

The Sixth Circuit has also explained that removing a child from his or her parents implicates the Fourth Amendment rights of both the child and his or her parents. *Pittman v. Cuyahoga Cnty. Dep't of Children and Family Servs.*, 640 F.3d 716 (2011).¹

It should read (change in bold):

The Sixth Circuit has also explained that removing a child from his or her parents implicates the **Fourteenth** Amendment rights of both the child and his or her parents. *Pittman v. Cuyahoga Cnty. Dep't of Children and Family Servs.*, 640 F.3d 716 (2011).

Dated: 2/5/2019
Detroit, Michigan

S/Avern Cohn
AVERN COHN
UNITED STATES DISTRICT JUDGE

¹A prior errata corrected the citation to *Pittman*. See Doc. 89.